

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Corinne Sanford
Debtor

Fay Servicing, LLC as servicer for U.S.
Bank Trust National Association, not in
its individual capacity, but solely as
Trustee of LSRMF MH Master
Participation Trust II

v.

Corinne Sanford
Kenneth E. West
Respondents

CASE NO.: 24-14270-pmm

CHAPTER 13

Judge: Patricia M. Mayer

Hearing Date: March 19, 2025 at 1:00 pm

Objection Deadline: March 14, 2025

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE, that Fay Servicing, LLC as servicer for U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II (on behalf of itself and together with any successor and/or assign “Movant”), filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. § 362 (d)(1); vacating the automatic stay to permit Movant, its successors and/or assigns, to enforce its mortgage on the Debtor’s premises located at 1204 West Susquehanna Avenue, Philadelphia, PA 19122.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before March 14, 2025 you or your attorney must do all of the following:

- (a) file an answer explaining your position at
United States Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400, Courtroom 1
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Lauren Moyer
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Phone: (212) 471-5100
Fax: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Patricia M. Mayer at Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Courtroom 1, Philadelphia, PA 19107 on March 19, 2025 at 1:00 pm, unless otherwise ordered by the Court.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: February 28, 2025

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Fay Servicing, LLC as servicer for
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TO:

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Bankruptcy Trustee

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United States Trustee
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United States Trustee